

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

ERIK PRINCE,

Plaintiff,

vs.

THE INTERCEPT, et al.

Defendants.

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Civil No. 20-cv-84-ABJ-KHR

**SECOND DECLARATION OF MATTHEW COLE**

Matthew Cole, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I submit this additional Declaration in further support of the Defendants' Motion to Dismiss the Complaint. I have personal knowledge of the facts stated in this Declaration and would be competent to testify to them.

2. As I testified in my previous Declaration, I believed Erik Prince to be a resident of Virginia during the time I have been reporting on him. That belief was informed in part by public record documents. By way of example, I am attaching to my Declaration, as Exhibits P through V, some of the news articles and official government filings from recent years that tie Mr. Prince to Virginia.

3. Attached hereto as Exhibit O is a true and correct copy of the article, *The Complete Mercenary: How Erik Prince Used the Rise of Trump to Make an Improbable Comeback*, published on or about May 3, 2019 by The Intercept, and also available at <https://theintercept.com/2019/05/03/erik-prince-trump-uae-project-veritas/>.

4. Attached hereto as Exhibit P is a compilation of true and correct copies of Federal Election Commission records, downloaded from FEC.gov, of contributions made by Erik Prince from 2016 to 2020, which reflect a Virginia address.

5. Attached hereto as Exhibit Q is a true and correct copy of the IRS 990-PF Form for the Freiheit Foundation, prepared on or about October 31, 2018, reflecting a Virginia address for Mr. Prince and for his wife, Stacy Deluke.

6. Attached hereto as Exhibit R is a true and correct copy of the IRS 990-PF Form for the Edgar and Elsa Prince Foundation, prepared on or about September 15, 2018, reflecting a Virginia address for Mr. Prince, a director of the Foundation.

7. Attached hereto as Exhibit S is a true and correct copy of the Virginia State Corporation Commission 2019 Annual Report for Townview Properties Management, Inc, dated September 3, 2019, reflecting a Virginia address for Mr. Prince, president/CEO.

8. Attached hereto as Exhibit T is a true and correct copy of the article, *Blackwater Founder Erik Prince Considering Wyoming Senate Bid*, published on or about October 8, 2017, by The Wall Street Journal, and addressing Mr. Prince's residency.

9. Attached hereto as Exhibit U is a true and correct copy of the article, *Erik Prince, Blackwater Founder, Weighs Primary Challenge to Wyoming Republican*, published on or about October 8, 2017, by The New York Times, and addressing Mr. Prince's residency.

10. Attached hereto as Exhibit V is a true and correct copy of the article, *Meet Erik Prince, former Navy Seal and founder of the most notorious security contractor who Steve Bannon wants to run for Senate*, published on or about October 9, 2017 by Business Insider, and addressing Mr. Prince's residency.

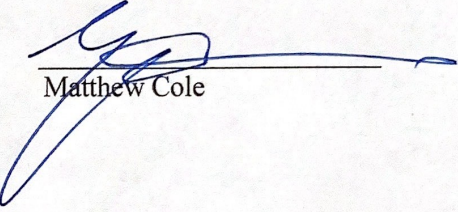
11. I did not write the news article that Mr. Prince now challenges with a Wyoming audience in mind, or intending to harm Mr. Prince in Wyoming. In no respect was Wyoming a focal point for me in reporting or writing the article.

12. Although I have made requests to Mr. Prince's representatives seeking to interview him, to date he has not agreed to speak with me. I have not spoken to Mr. Prince directly, in Wyoming or otherwise.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 23 SEPT 2020  
Date

Executed in New York, New York  
City and State

  
Matthew Cole